



Department of Toxic Substances Control



5796 Corporate Avenue Cypress, California 90630

October 20, 2005

Mr. Philip Mook AFRPA/ Western Region Execution Center 3411 Olson Street McClellan, California 95652-1071

FINAL SUPPLEMENTAL ENVIRONMENTAL BASELINE SURVEY (SEBS) AND FINAL FINDING OF SUITABILITY TO TRANSFER (FOST), PARCEL A-9, FORMER MARCH AIR FORCE BASE (MAFB), CALIFORNIA

Dear Mr. Mook:

The Department of Toxic Substances Control (DTSC) received the subject documents via email on September 9, 2005. Parcel A-9 is approximately 32 acres consisting of open space, a wastewater treatment plant (WWTP) and seventeen structures associated with the WWTP. The anticipated use of the property, as stated in the FOST, is to continue operation of the WWTP by Western Municipal Water District (WMWD). The SEBS documents the environmental conditions of the property while the FOST is intended to establish that the property is suitable for transfer by deed. In this final version of the FOST, the Air Force included an unresolved comment with regard to DTSC's comment on lead-based paint (LBP).

Parcel A-9 includes facilities that were constructed prior to 1978, the year when LBP products were discontinued. The age of these facilities suggest the likelihood that LBP may be present on these facilities. This in turn creates the possibility that, through the action of normal weathering and maintenance, there may be lead from LBP in the soil surrounding these facilities. DTSC considers the presence of exterior LBP that has been released to the soil as a potential release to the environment pursuant to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). The only LBP evaluations noted in the SEBS were visual site inspections conducted on February 18, 2005, which indicated that the interior and exterior painted surfaces of some of the facilities were chipped, cracked, peeling or flaking. Soil sampling in the vicinity of pre-1978 facilities is necessary to ensure that lead from LBP is not present at levels posing a threat to human health and the environment. Absent the evaluation of soil-lead hazards, the Air Force must place appropriate restrictions and notifications in

Mr. Philip Mook October 20, 2005 Page 2

the FOST and all associated sale and transfer documents to ensure public health and environmental protection.

The LBP notification and restriction language DTSC proposed was not included in the final FOST, hence the unresolved comment. However, there is an adequate LBP deed notification included in the FOST and yesterday DTSC received assurances from you that the entire Parcel A-9 will have a residential use prohibition (deed restriction), which will require amending the FOST.

That being said, all of DTSC's comments on the draft SEBS and draft FOST have been adequately addressed. DTSC concurs that the property associated with this FOST can be transferred with the specified conditions, notifications and restrictions in a manner that is protective of human health and the environment. Please provide DTSC with a copy of the amended FOST. Additionally, the FOST figures, sent via email, are not legible due to scanning resolution. We would appreciate hard copies of the FOST figures.

Thank you for providing DTSC with the final SEBS and FOST documents. If you have any questions regarding this letter, please contact Mr. Manny Alonzo at (714) 484-5425 or Mr. Stephen Niou at (714) 484-5458.

Sincerely

John Scandura, Chief

Office of Military Facilities Southern California Operations Branch

CC:

Mr. John Lucey Mail Stop SFD8-1 U.S. EPA, Region 9 75 Hawthorne Street

San Francisco, California 94105

Mr. Philip Mook October 20, 2005 Page 3

bcc:

Jennifer Rich

HSS

Office of Military Facilities
Cypress Office